

Risk Management Program

Emergency Response



June 26-28, 2007
Richland, Washington

Accidents do happen!!



Emergency Response



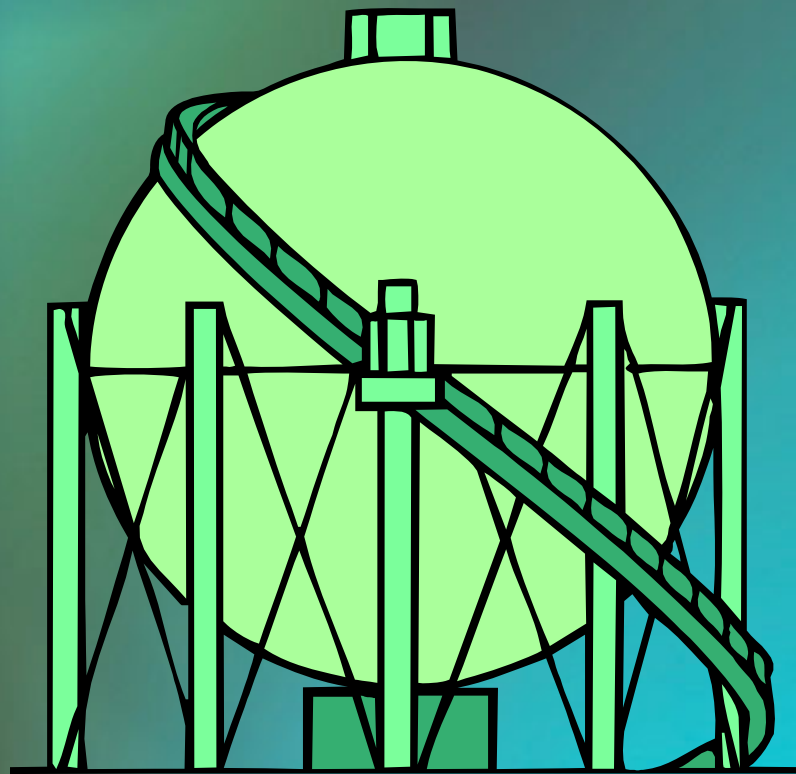
- Facilities have the option to respond to their own emergencies or rely on local HAZMAT responders
- For all Program 2 or 3 facilities, they must decide on how emergencies will be handled

Non-Responding Facilities

- All Non-Responding Facilities:
 - Do not need an Emergency Response Program, if:
 - Coordination with local response agencies is arranged;
 - A formal notification procedure is in place to activate the response



Non-Responding Facilities



- Coordination with response agencies must occur:
 - Facilities with toxic substances must be included in the Community Emergency Response Plan
 - Facilities with flammables must work with the local fire department regarding response procedures

Non-Responding Facilities

- Notification of Response Agencies:
 - Must establish appropriate mechanism to notify emergency responders in an emergency
 - Must identify an emergency contact that the responder will call for a toxic or flammable release



Responding Facilities



- Must have an Emergency Response Program that includes:
 - Written Emergency Response Plan
 - Procedures for using, inspecting, testing, and maintaining emergency response equipment
 - Training for employees
 - Have procedures to update the emergency response plan

Emergency Response Program

- Elements of the Emergency Response Plan:
 - Procedures for informing the public and emergency response agencies about releases
 - Documentation of proper first aid and emergency medical treatment necessary to treat human exposures
 - Procedures and measures for emergency response after an accidental release
 - Complies with other contingency plan regulations or the Integrated Contingency Plan Guidance
 - Coordinated with the Community Emergency Response Plan

Emergency Response Issues



- Facilities that respond to emergencies must understand:
 - OSHA requires any facility that handles “hazardous substances” to comply with HAZWOPER regulations
 - If employees of the facility are members of the HAZMAT team, they are subject to additional HAZWOPER requirements

Nexus between EPA and OSHA



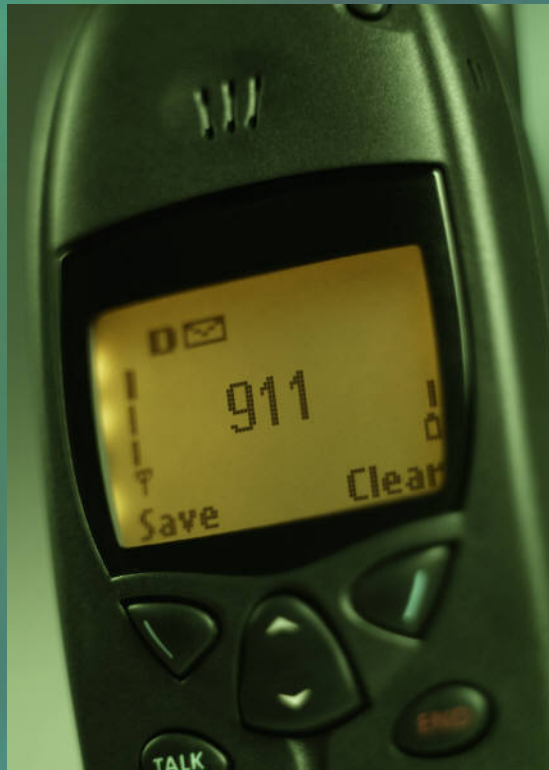
- Hazardous Waste Operations and Emergency Response
 - 29 CFR 1910.120
 - (a)(2)(iv) Emergency response operations for releases of, or substantial threats of releases of hazardous substances which are not covered by paragraphs (a)(1) through (a)(1)(iv) of this section must only comply with the requirements of paragraph (q) of this section

What triggers an Emergency Response?

- An event or release that:
 - External emergency affecting ongoing operations
 - Requires evacuation of employees or the public from the area
 - Poses or has the potential to pose conditions that are immediately dangerous to life and health
 - Poses a serious threat of fire or explosion
 - Requires immediate attention because of imminent danger
 - May cause high levels of exposure to toxic substances
 - Creates uncertainty that the employees can handle the situation with their regular equipment and exposure limits have not been exceeded
 - Causes a situation to be unclear or information is lacking to make informed decisions

Emergency Response

EPA & OSHA

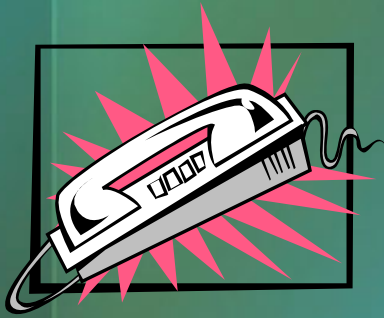


- EPA requires that facilities to have emergency response procedures to **inform** the public and responders and have **measures in place** to manage an offsite release of a hazardous substance
- OSHA requires that facilities protect their employees by **evacuation, accounting for employees, and moving responders** into position to manage a release

Emergency Response OSHA

- Facilities who chose to rely on responders must have an Emergency Action Plan (29 CFR 1910.120 (q) (1) & 29 CFR 1910.38)
- Facilities who chose to manage their own response must have an Emergency Response Plan (29 CFR 1910.120 (q) (2)) and possibly 29 CFR 1910.156 (fire brigades)

Communication



- Most important to protect employees and the community
- Must be able to communicate with emergency responders regarding safety and employees and community regarding evacuation or sheltering-in-place

Alarm Systems



- Employers must have and maintain alarm systems
- Alarm system must use a distinctive signal for each purpose
- Capable of being perceived above all ambient noise or light levels
- Be distinctive and recognizable as a signal to evacuate the work area

Emergency Response Equipment







